201-14448

CYTEC

CYTEC INDUSTRIES INC.

Toxicology & Product Regulatory
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April 9, 2003

US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
Attention: Chemical-Right-To- Know Program/ Mr. Richard Hefter

Dear Mr. Hefter:

In keeping with Cytec's 1999 commitment to the EPA High Production Volume Voluntary program, we have previously submitted a robust summary and test plan for CAS # 2778-42-9, Isocyanic acid, m-phenylenediiso-propylidene. We have subsequently reviewed EPA's comments regarding our submission. We have been able to add the requested additional detail to our submission from previously conducted studies. With respect to data gaps, Cytec intends to conduct the following additional studies:

- Hydrolysis- as per OECD TG 11 1
- Water solubility- if hydrolysis is found to be slow, we intend to conduct a water solubility study as per OECD TG 105). If hydrolysis is rapid, we believe that our modeled data is accurate and appropriate.
- Chromosomal aberrations as per OECD 473
- Developmental toxicity- we have previously conducted repeat-dose inhalation studies which also address reproductive endpoints. As pointed out by EPA, we have not addressed developmental endpoints. While we have considered conducting an in-vitro screen (embryonic stem cell assay), we have not been able to locate a commercial laboratory which can conduct this assay under GLP guidelines and have been advised that EPA will not accept this assay as a surrogate for a developmental endpoint. As such, we intend to conduct an inhalation teratology study as per OECD 414

The revised robust summary and test plan is provided as hard copy and in pdf format.

Sincerely,

Randy Deskin, Ph.D., DABT
Director, Toxicology and Product Regulatory Compliance